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DIVISIONPfizer Inc.  
235 East 42nd Street  
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## Facsimile Transmission

Dec 30 12 23 PM '99

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TO:	FAX NO:
Dominick Ciavaldi	(202) 219-3496
CC:	FAX NO:
Bill Farrah	(202) 887-4288

No. of Pages: (including this page) 6

From: Beth F. Levine

Department Name: Legal Division  
USPG

Charge No.:

Facsimile Telephone: (212) 573-3977

Date: December 30, 1999

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**MESSAGE:**

Legal Division  
Pfizer Inc.  
235 East 42nd Street  
New York, NY 10017-4099  
Tel 212 579 9805  
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DIVISION



Dec 30 12:23 PM '99

Beth E. Levine  
Corporate Counsel

December 30, 1999

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00016683

Reference: July Monthly Report (6/1/99 - 6/30/99)

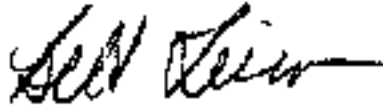
Dear Mr. Ciaraldi:

We are in receipt of your letter dated December 15, 1999 to Alan G. Levin, Treasurer, Pfizer Inc. PAC. With respect to the above-referenced matter, and in reference as well to similar issues with the November Monthly Report (10/1/99 - 10/31/99) please be advised that the receipts from Pfizer PAC-State itemized on Schedule A, line 12 were refunds of an earlier transfer made by Pfizer PAC to Pfizer PAC-State. They were not transfers from Pfizer PAC's non-Federal account to its Federal account.

More specifically, Pfizer PAC (Pfizer PAC's Federal account) funds are used exclusively to finance non-Federal activities through Pfizer PAC-State. This is accomplished by transferring funds from Pfizer PAC to Pfizer PAC-State (including Pfizer PAC-NY) as needed for making State or local contributions. In each of the instances cited in your letters, Pfizer PAC-State elected not to use the funds to make the contributions and refunded the transferred funds to Pfizer PAC Federal. Thus, all of the funds refunded to Pfizer PAC were derived from permissible funds and, indeed, consist solely of funds that came from Pfizer PAC in the first place.

Accordingly, we do not at this time intend to modify the July or November Monthly Reports. If you have any further questions about this matter, please don't hesitate to call me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Beth Levine", with a long horizontal flourish extending to the right.

Beth F. Levine

Legal Division  
Pfizer Inc.  
235 East 42nd Street  
New York, NY 10017-5745  
Tel 212 573 3805 Fax 212 573 3977

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REPORTS ANALYSIS  
DIVISION



Beth E. Levine  
Corporate Counsel

DEC 30 12 23 PM '99

December 30, 1999

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00018683

Reference: November Monthly Report (10/1/99 - 10/31/99)

Dear Mr. Ciaraldi:

We are in receipt of your letter dated December 15, 1999 to Alan G. Levin, Treasurer, Pfizer Inc. PAC. Your letter raised two concerns: (1) transfers from non-federal accounts to the Pfizer PAC; and (2) apparent contributions to the Pfizer PAC in excess of statutory limits.

With respect to the first inquiry, please refer to our letter to you dated this same date with reference to the July Monthly report (6/1/99 - 6/30/99), which addresses this issue in full.

With respect to the second inquiry, please be advised that we have looked into the matter and found that two employees inadvertently contributed amounts in excess of the annual limit. Accordingly, on or about December 22, 1999, refunds were issued to Constantine L. Clemente in the amount of \$833.65 and David L. Shedlarz in the amount of \$659.07. The total amount of these refunds (\$1,592.72) will appear on Line 28A of Detailed Summary Page and a separate Schedule B.

If you have any further questions about this matter, please don't hesitate to call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Beth Levine", with a long horizontal flourish extending to the right.

Beth F. Levine

Legal Division

Pfizer Inc.

235 East 42nd Street

New York, NY 10017-5755

Tel 212 573 5005 Fax 212 573 3977

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REPORTS ANALYSIS  
DIVISION

Dec 30 12 23 PM '99



Beth F. Levine  
Corporate Counsel

December 30, 1999

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00016883

Reference: June Monthly Report (5/1/99-5/31/99)

Dear Mr. Ciaraldi:

We are in receipt of your letter dated December 15, 1999 to Alan G. Levin, Treasurer, Pfizer Inc. PAC. With respect to the above-referenced matter, please be advised that the contribution to Trent Lott for Mississippi dated 3/24/97 in the amount of \$1,000.00 was improperly characterized as a contribution to a 1998 Primary Election. The contribution should have been recorded as a contribution for the General Election in 2000. The recording of this contribution will be corrected on our December 1999 FEC report.

If you have any further questions about this matter, please don't hesitate to call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Beth F. Levine".

Beth F. Levine

## Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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